IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

SIMON CHIKHLADZE,
Plaintiff,
v.
TBILISI-BASED ORGANIZED GROUP,
Defendants.

Case No.:

COMPLAINT FOR VIOLATION OF INTERNATIONAL LAW UNDER 28 U.S.C. § 1350 (ALIEN TORT STATUTE) AND 18 U.S.C. § 1203 (HOSTAGE TAKING ACT)
JURY TRIAL DEMANDED

I. INTRODUCTION

1. This is a civil action brought by Plaintiff under **28 U.S.C. § 1350 (Alien Tort Statute)** and **18 U.S.C. § 1203 (Hostage Taking Act)** for violations of international law and U.S. law committed by Defendants, a Tbilisi-based organized group, acting through uniformed individuals under their control at Tbilisi International Airport, Georgia
2. Plaintiff seeks relief for the violation of universally accepted norms of international law, including, but not limited to, the arbitrary denial of freedom of movement, torture, hostage-taking, and abuse of authority in violation of customary international law and U.S. statutory law.
3. Defendants' actions were carried out with the intent to harm Plaintiff, deprive Plaintiff of rights protected under international law, and coerce Plaintiff into refraining from pursuing legal and human rights claims, causing significant personal, emotional, and professional harm.
4. Plaintiff has made numerous formal notifications to relevant U.S. authorities and the U.S. Embassy in Georgia, describing the ongoing threats, harassment, and abuses endured by Plaintiff.
5. Despite these efforts, relevant federal agencies have failed to fulfill their legal and moral obligations to protect Plaintiff, constituting a dereliction of duty and a violation of Plaintiff's constitutional and human rights.

CONTINUED THREATS AND HARASSMENT

6. As both a complainant bringing sensitive national security matters to light and a victim of the circumstances described, Plaintiff has legitimate and well-founded fears for Plaintiff's personal safety and that of Plaintiff's family members.

7. Plaintiff has submitted documentation to the appropriate authorities, including the Department of Justice, outlining ongoing **threats**, **harassment**, and **human rights abuses** reportedly perpetrated against Plaintiff by certain European and regional actors, operating through intermediaries in Georgia.

8. Plaintiff believes the circumstances meet the statutory definitions warranting placement within the **Witness Security Program**'s auspices, as several individuals directly accused by Plaintiff hold influential positions and have longstanding ties to foreign intelligence outfits.

9. Based on past experiences, Plaintiff has reason to believe that retribution against Plaintiff and Plaintiff's family members is a continued and imminent risk.

JURISDICTION AND VENUE

10. This Court has jurisdiction over this matter pursuant to:

- **28 U.S.C. § 1350 (Alien Tort Statute)**, as Defendants' actions constitute violations of customary international law, including torture, hostage-taking, and arbitrary detention.
- **18 U.S.C. § 1203 (Hostage Taking Act)**, as the claims involve acts of hostage-taking committed against Plaintiff, a U.S. taxpayer and temporary resident.

11. Venue is proper in this District under **28 U.S.C. § 1391(c)(3)** because the Defendants are subject to jurisdiction in the United States, and a substantial part of the events giving rise to the claims has a connection to the United States through **codeshare operations involving United Airlines**, a U.S. entity.

PARTIES

12. **Plaintiff**: Plaintiff, **Simon Chikhladze**, is a **temporary resident of the United States** and a U.S. taxpayer. Plaintiff has been involuntarily relocated to Georgia, where Plaintiff has been subjected to egregious and inhumane treatment, including torture, extraordinary rendition, and obstruction of justice, orchestrated by the Defendants.

13. **Defendants**: Defendants are a **Tbilisi-based organized group** operating in Georgia and engaging in conduct that violates international law. This group operates under the guise of local authority, including uniformed personnel in the passport control area of Tbilisi

International Airport.

14. The specific names of the individuals involved are unknown to Plaintiff at this time, but Plaintiff reserves the right to amend this Complaint to include additional Defendants as their identities are discovered.

FACTUAL ALLEGATIONS

15. On **February 29, 2024**, Plaintiff arrived at Tbilisi International Airport to board **Lufthansa Flight 2559**, a codeshare flight operated as **United Airlines Flight 8755**, bound for Munich, Germany.

16. While in the passport control area, Plaintiff was arbitrarily denied boarding by uniformed personnel acting under the direction of the organized group.

17. These individuals provided no lawful reason for the denial of boarding and ignored Plaintiff's valid ticket and travel documentation
using threats, intimidation, and physical harm to compel Plaintiff to abandon legal claims and advocacy efforts.

18. Defendants' actions included:
    a. Torture using a Graetz generator, causing severe physical and psychological harm.
    b. Arbitrary denial of travel on multiple occasions, including fabricated financial transactions and theft of travel documents.
    c. Harassment and threats against Plaintiff and Plaintiff's family members.

19. Defendants acted with the intent to compel Plaintiff to refrain from pursuing legal claims and to intimidate Plaintiff into silence regarding human rights abuses.

20. The denial of boarding was not based on security concerns, immigration issues, or any lawful basis but was instead an act of **arbitrary discrimination** and **abuse of authority** orchestrated by Defendants.

21. **United Airlines** was an **indirect participant** in this incident due to its codeshare relationship with Lufthansa. While United Airlines did not knowingly engage in or authorize the unlawful actions, its brand and operations were implicated by the organized group's conduct.

22. Plaintiff currently reside at 38 Mitskevich Street, Tbilisi, Georgia, where he is subjected to continuous torture. These acts are carried out using a modified **Graetz washing machine generator (model W610F45)** as a tool for inflicting sleep deprivation and

physical and psychological harm. This device emits electromagnetic waves, causing severe physical pain, disorientation, and psychological distress.

REGIONAL AND FOREIGN ACTOR INTERFERENCE

23. Plaintiff has observed and documented a troubling network of **regional actors**, including individuals affiliated with Danish organizations, Gaza security services, and regional intelligence entities.

24. These actors, supported by local Georgian authorities, have engaged in covert operations against Plaintiff and Plaintiff's family members.

25. Plaintiff believes these external actors influenced the decision-making process of Plaintiff's **denied boarding on international flights**, with tacit complicity from the aforementioned agencies.

26. There were also two previous, unsuccessful attempts to leave Georgia:
a) **Tbilisi to Barcelona on November 16, 2023**, where boarding was denied due to the suspicious, last-minute theft of Plaintiff's passport;
b) **Yerevan to Vienna on May 18, 2024**, where travel failed due to a fabricated bank transaction to WizzAir via a travel agency, which never reached the addressee.

LEGAL CLAIMS

COUNT I: VIOLATION OF INTERNATIONAL LAW UNDER 28 U.S.C. § 1350 (ALIEN TORT STATUTE)

27. Plaintiff incorporates by reference all preceding paragraphs as if fully stated herein.

28. Defendants' actions constitute a violation of universally accepted norms of international law, including but not limited to:
a) **Arbitrary denial of freedom of movement**;
b) **Discrimination based on Plaintiff's political thinking**;
c) **Abuse of authority by individuals acting under the apparent authority of the organized group**.

29. Defendants acted with intent to harm Plaintiff and in reckless disregard of Plaintiff's rights under international law.

30. As a direct and proximate result of Defendants' actions, Plaintiff suffered severe harm, including emotional distress, financial loss, and reputational damage.

COUNT II: VIOLATION OF 18 U.S.C. § 1203 (HOSTAGE TAKING ACT)

31. Plaintiff incorporates by reference all preceding paragraphs as if fully stated herein.

32. Defendants' actions constitute hostage-taking under 18 U.S.C. § 1203, as they involved:

    - Detaining Plaintiff by denying freedom of movement and subjecting Plaintiff to torture and harassment.
    - Acting with the intent to compel Plaintiff to refrain from pursuing legal claims and advocacy efforts.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendants, and grant the following relief:

1. Declare that Defendants' actions violated international law under **28 U.S.C. § 1350 (Alien Tort Statute)** and U.S. law under **18 U.S.C. § 1203 (Hostage Taking Act)**.
2. Award Plaintiff compensatory damages in an amount to be determined at trial.
3. Award Plaintiff punitive damages to deter future violations of international and U.S. law.
4. Grant such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DATED: March 27, 2025

Respectfully submitted,

s/Simon Chikhladze

SIMON CHIKHLADZE
38 Mitskevich Street
Tbilisi, Georgia
+995599066780

schikhladze0@gmail.com